

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

In re:

MID-STATES SUPPLY COMPANY, INC.,

Debtor.

Chapter 11

Case No. 16-_____ (____)

**MOTION FOR ENTRY OF ORDER PROHIBITING UTILITY PROVIDERS FROM
DISCONTINUING SERVICES AND APPROVING FORM OF ADEQUATE
ASSURANCE OF PAYMENTS FOR THE CONTINUATION OF UTILITY SERVICES**

Debtor Mid-States Supply Company, Inc. (“Debtor”), pursuant to 11 U.S.C. §§ 105(a) and 366 and Fed. R. Bank. P. 9013 and in support of this Motion for Entry of Order Prohibiting Utility Providers from Discontinuing Service and Approving the Form of Adequate Assurance of Payment for the Continuation of Utility Services (the “Motion”), states and alleges as follows:

Procedural Background

1. On February 7, 2016 (the “Petition Date”), Debtor for relief under Chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Western District of Missouri.
2. Debtor remains in possession of its assets and continues to operate as debtor-in-possession in accordance with Code §§ 1107 and 1108.
3. An Official Committee of Unsecured Creditors has not yet been appointed.
4. This is a core proceeding pursuant to 28 U.S.C. § 157(2)(A).
5. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334.
6. Venue is proper in this Court pursuant to 28 U.S.C. § 1408.

Debtor’s Background

7. Debtor supplies pipes, valves and fittings to ethanol, pipeline and power industries in the United States. It also offers hoses, tools, compounds, gauges and thermometers.

In addition, Debtor provides compressed air, steam, process control and services, along with IT solutions, such as project and customer websites, PocketPC software, customer inventory management, integrated supply, order tracking system and communication options. Debtor's products are sold to a myriad of industries, including large industrial plant operations, food production, oil and gas pipeline transportation, mechanical construction and other large industrial players.

8. Founded and headquartered in Kansas City, Missouri since 1947, Debtor, a family-owned company, operates out of 23 locations, certain of which branches operate under the "Midco" fictitious brand name, in the following states—Alabama, Colorado, Kansas, Louisiana, Mississippi, Missouri, Montana, Nebraska, New Mexico, North Dakota, Oklahoma, Texas, Utah, West Virginia and Wyoming. Debtor currently has approximately 228 employees.

9. On September 1, 2011, Debtor entered into Credit and Security Agreement, as amended from time to time (the "Credit Agreement") with Wells Fargo Bank, National Association ("Wells Fargo"), under which it borrowed \$45 million, which line grew with its growth to approximately \$60 million. Using the expanded availability from Wells Fargo, Debtor roughly doubled its sales and EBITDA from fiscal 2011 through today. By 2015, a confluence of factors, including the demand for inventory with over 32,000 SKU's, no concentration in the customer base (meaning a broad demand for stocked product) and a rapid decline in the oil and gas sector, kept Debtor's inventory and payables at unsustainably high levels. These factors led Debtor's management to implement plans to right-size the business with respect to inventory, payables, rationalizing the customer base, operating expenses and tightly managing cash flow.

10. As a result of various defaults under the Credit Agreement, on August 28, 2015, Debtor entered into its first forbearance agreement with Wells Fargo. In connection with this

forbearance agreement and Debtor's restructuring efforts, on August 25, 2015, Debtor engaged Winter Harbor LLC to provide certain services of a chief restructuring officer ("CRO") and other support services. Stuart Noyes has been acting as Debtor's CRO since August 2015 pursuant to an engagement letter dated August 25, 2015, which is discussed in further detail in Debtor's application to employ Winter Harbor LLC.

11. Since the first forbearance agreement with Wells Fargo, Debtor has entered into two other forbearance agreements with Wells Fargo, the most recent of which, dated December 28, 2015, expires by its terms on February 29, 2016 and contains numerous benchmarks (the "Benchmarks"). While Debtor and its CRO have been working tirelessly to restructure its business and meet the Benchmarks, Debtor has determined in its business judgment that filing the captioned bankruptcy case is in the best interest of its creditors.

Relief Requested

12. The operation of Debtor's business requires payment for utility services, including but not limited to electricity, water, gas, telephone, internet and trash services, to numerous utility providers (collectively, the "Utility Providers").

13. As of the Petition Date, Debtor obtains utility services from numerous Utility Providers. A detailed summary of the Utility Providers is attached as **Exhibit A**.

14. Uninterrupted utility services are essential to Debtor's operations, reorganization and the success of Debtor's efforts to protect the value of its assets.

15. By the Motion, Debtor seeks a proactive order: (1) finding that the proposed assurance of future payment is adequate as to the Utility Providers within the meaning of Code § 366; (2) prohibiting the Utility Providers from altering, refusing, or discontinuing service to Debtor on account of pre-petition amount outstanding or on account of any perceived inadequacy

of Debtor's proposed adequate assurance; and (3) determining that Debtor is not required to provide any additional adequate assurance beyond what is proposed by the Motion.

16. Code § 366 protects Debtor against the immediate termination of utility services after the Petition Date. Under Code § 366, the Utility Providers may not, during the first 30 days of a Chapter 11 case, alter, refuse, or discontinue services to, or discriminate against Debtor solely on the basis of the commencement of the case or the failure of Debtor to pay a pre-petition debt. The Utility Providers may, however, do so if, following such 30-day period, Debtor does not provide "adequate assurance" of payment for post-petition services in a form "satisfactory" to the Utility Providers, subject to the Court's ability to modify the amount of adequate assurance. Pursuant to Code § 366(c)(3)(B), in determining whether an assurance of payment is adequate, the Court may not consider (a) the absence of security before the Petition Date, (b) Debtor's history of timely payments, or (c) the availability of an administrative expense priority.

17. BAPCPA dramatically altered Code § 366. Among these amendments was the creation of a new statutory scheme governing Chapter 11 debtors. Most ominously, Code § 366(c)(2) appears to grant the Utility Providers unilateral power to hold a debtor hostage by threatening to cut off service unless the provider receives adequate assurance deemed acceptable by the provider on a subjective basis. Fortunately, the Bankruptcy Code does provide the Court with the power to intervene to prevent such abuse by utility providers.

18. The Court retains the discretion to determine the amount of adequate assurance necessary or to change the fundamental requirement that assurance of payment must simply be adequate. *Compare* Code § 366(b) ("On request of a party-in-interest and after notice and a hearing, the court may order reasonable modification of the amount of the deposit or other security necessary to provide adequate assurance.") with Code § 366 (c)(3)(A) ("On request of a

party-in-interest and after notice and a hearing, the court may order modification of the amount of an assurance payment under paragraph (2) [which is governed by an adequacy standard]”).

19. Courts construing Code § 366(b) have long recognized that in determining adequate assurance, the Court is not required to give the utility providers the equivalent of a guaranty of payment, but must only determine that the utility is not subject to an unreasonable risk of nonpayment for post-petition services. *In re Astle*, 338 B.R. 855, 861 (Bankr. D. Idaho 2006); *In re Steinebach*, 303 B.R. 634, 641 (Bankr. D. Ariz. 2004) (“Adequate assurance of payment is not... absolute assurance. The key to achieving the balance required by § 366 is not to confuse adequate assurance with adequate protection, which must be provided to a creditor under 11 U.S.C. § 361.”). Historically, whether a utility is subject to an unreasonable risk of nonpayment must be determined from the facts and circumstances of each case. See *In re Anchor Glass Container Corp.*, 342 B.R. 872, 875 (Bankr. M.D. Fla. 2005). While Code § 366(c) limits the factors a court may consider, it is likely that determinations of adequate assurance will remain within the Court’s discretion. *In re Adelphia Bus. Solutions, Inc.*, 280 B.R. at 63, 80 (Bankr. S.D.N.Y. 2002); *Marion Steel Co. v. Edison Co. (In re Marion Steel Co.)*, 35 B.R. 188, 195 (Bankr. D. Ohio 1983).

20. As stated by a Virginia bankruptcy court, “§ 366(c)(3)(A) provides that on request of a party in interest and after notice and a hearing, the court may order modification of the amount of an assurance of payment under paragraph 2. Assurance of payment is defined in § 366(c)(1), and upon a request for a hearing under § 366(c)(3)(A), the court must determine whether the assurance of payment is adequate, operating within the restrictions outlined in § 366(c)(3)(B). In sum, the court is authorized to modify the assurance of payment pursuant to § 366(c)(3)(A) after notice and a hearing, and a debtor is not required to first pay a demand that is

unilaterally satisfactory to the utility company.” *In re Circuit City Stores, Inc.*, Slip Copy, 2009 WL 484553, 5 (Bankr. E.D. Va. 2009).

21. Moreover, a Florida bankruptcy court has held, “[a]n interpretation of § 366 that precludes court intervention unless a debtor posts whatever amount is demanded could lead to absurd results and cannot be what Congress intended. Instead, the Court finds that it has the authority to determine the form and amount of adequate assurance if the parties cannot reach agreement, as long as the form of the assurance of payment is one of the forms described in 366(c)(1)(A). *See* 3 Collier on Bankruptcy ¶ 366.03[2] (rev. 15th ed. 2006) (“Under § 366(c)(2), the debtor must pay what the utility demands, unless the court orders otherwise”) (emphasis added).” *In re Beach House Property, LLC*, Slip Copy, 2008 WL 961498, 2 (Bankr. S.D. Fla. 2008).

22. Clearly, the Court is empowered to deem adequate Debtor’s plan to provide assurance of future payment and to prohibit the discontinuance of utility services.

23. In order to provide its Utility Providers with adequate assurance of future payment, Debtor proposes to pay each Utility Provider’s invoices as they come due in the ordinary course of Debtor’s business, pursuant to the budgets approved in the post-petition financing and cash collateral motion filed herein.

24. Further, Debtor will permit each Utility Provider holding a security deposit to retain such deposit as additional adequate assurance of Debtor’s future performance. Such deposits shall be returned to Debtor on the terms and conditions of the parties’ service agreements.

25. In addition, Debtor will provide adequate notice of this Motion and objection deadline to the Utility Providers.

26. Debtor submits that the proposed form of adequate assurance of future performance does not subject the Utility Providers to undue risk and should be approved. Absent an entry of an Order by this Court approving the form of the required adequate assurance of payment, the Utility Providers may alter, refuse or discontinue further utility services to Debtor under Code § 366(c)(2). Such actions would have an immediate and detrimental effect on Debtor, its estate and Debtor's ability to reorganize effectively.

WHEREFORE, Debtor requests that this Court enter an Order: (1) finding that the proposed assurance of future payment is adequate as to the Utility Providers within the meaning of Code § 366; (2) prohibiting the Utility Providers from altering, refusing, or discontinuing service to Debtor on account of pre-petition amount outstanding or on account of any perceived inadequacy of Debtor's proposed adequate assurance; (3) determining that Debtor is not required to provide any additional adequate assurance beyond what is proposed by the Motion; and (4) granting any other relief at equity or law that this Courts deems necessary.

February 7, 2016

SPENCER FANE LLP

By: /s/ Lisa A. Epps

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PROPOSED COUNSEL FOR DEBTOR

EXHIBIT A

Location	Service Type	Utility Provider Name	Address1	Address2	City	State	Zip	Phone No.	Fax No.	Account No.
Wichita	CELL PHONE SERVICES	AT&T	P.O. BOX 6463		CAROL STREAM	IL	60197-6463	866-281-6567	302-655-5049	433965900
Wichita	CELL PHONE SERVICES	AT&T	P.O. BOX 6463		CAROL STREAM	IL	60197-6463	866-281-6567	302-655-5049	826550993
KC/L/STEAM	CELL PHONE SERVICES	AT&T	P.O. BOX 6463		CAROL STREAM	IL	60197-6463	866-281-6567	302-655-5049	82474820
Guymon	CELL PHONE SERVICES	PTCI	P.O. Box 1188		Guymon	OK	73942	800-562-2556		2125
COMPANY WIDE	CELL PHONE SERVICES	VERIZON WIRELESS	P.O. Box 25505		LEIGH VALLEY	PA	18002-5505	913-364-2600	212-571-1897	98058836-000013,5,4
COMPANY WIDE	COMPUTER/PROPHET 21 SUPPORT	EPICORE SOFTWARE CORP	P.O. Box 671069		DALLAS	TX	75267-1069	888-354-5312	512-356-0500	CUST # 108018
Kansas City	CYBER SERVICES	AT&T	P.O. BOX 5019		CAROL STREAM	IL	60197-5019	800-235-7524	302-655-5049	831-000-5256 218
ALABAMA	ELECTRIC SERVICES	ALABAMA POWER	P.O. BOX 242		BIRMINGHAM	AL	352992	884-30-5787		26593-1-2019
STL	ELECTRIC SERVICES	AMEREN MISSOURI	P.O. BOX 88068		CHICAGO	IL	60680-1068		866-222-3471	
Greeley	ELECTRIC SERVICES	ATMOS Energy	P.O. Box 790311		St. Louis	MO	63179-0311			Act#600460724-2-0011712-0
Artesia	ELECTRIC SERVICES	Central Valley Electric	P.O. Box 230		Artesia	NM	88211 575-746-7571	575-746-4219	96997	due 6-22
Cheyenne	ELECTRIC SERVICES	Cheyenne Light,Fuel & Power	P.O. Box 6100		Rapid City	SD	57709-6100	800-540-2486	4807-5629-03	
HOUSTON	ELECTRIC SERVICES	GREEN MOUNTAIN ENERGY	P.O. Box 650001		DALLAS	TX	75265-0001			
Kansas City	ELECTRIC SERVICES	KANSAS CITY POWER & LIGHT	P.O. Box 219330		KANSAS CITY	MO	64121-9930	800-585-4248	816-556-2992	11857011
Kansas City	ELECTRIC SERVICES	KANSAS CITY POWER & LIGHT	P.O. Box 219330		KANSAS CITY	MO	64121-9930	800-585-4248	816-556-2992	1283-12-7162
Kansas City	ELECTRIC SERVICES	KANSAS CITY POWER & LIGHT	P.O. Box 219330		KANSAS CITY	MO	64121-9930	800-585-4248	816-556-2992	1387-12-6180
Kansas City	ELECTRIC SERVICES	KANSAS CITY POWER & LIGHT	P.O. Box 219330		KANSAS CITY	MO	64121-9930	800-585-4248	816-556-2992	3033-30-1795
Kansas City	ELECTRIC SERVICES	KANSAS CITY POWER & LIGHT	P.O. Box 219330		KANSAS CITY	MO	64121-9930	800-585-4248	816-556-2992	4147-09-3039
Kansas City	ELECTRIC SERVICES	KANSAS CITY POWER & LIGHT	P.O. Box 219330		KANSAS CITY	MO	64121-9930	800-585-4248	816-556-2992	487-21-902
Kansas City	ELECTRIC SERVICES	KANSAS CITY POWER & LIGHT	P.O. Box 219330		KANSAS CITY	MO	64121-9930	800-585-4248	816-556-2992	7596-18-7444
DES MOINES	ELECTRIC SERVICES	MIDAMERICAN ENERGY	P.O. Box 657		DES MOINES	IA	50306		563-336-3568	
OSKALOOSA	ELECTRIC SERVICES	MIDAMERICAN ENERGY	P.O. Box 657		AKRON	OH	44309-3615	800-686-0022		110 109 972 841
CLARKSBURG	ELECTRIC SERVICES	MON POWER	P.O. Box 3615		AKRON	OH	44309-3615	800-686-0022		
Billing	ELECTRIC SERVICES	MON POWER	P.O. Box 3615		Butte	MT	59701-1711	800-245-6977	405-497-2529	act 1846504 due 6-18
Omaha	ELECTRIC SERVICES	OMAHA PUBLIC POWER DISTRICT	P.O. Box 3995		OMAHA	NE	68103-0995		402-636-3914	954-173-578-1-1
Tulsa	ELECTRIC SERVICES	Public Service Company of Oklahoma	P.O. Box 24421		Omaha	NE	68103-0995			
Tulsa	ELECTRIC SERVICES	Public Service Company of Oklahoma	P.O. Box 24421		Omaha	NE	68103-0995			
Salt Lake	ELECTRIC SERVICES	Rocky Mountain Power	P.O. Box 26000		Portland	OR	97256-0001	800-883-4162	Act#1167777-001 3 due 6-30	
Dickinson	ELECTRIC SERVICES	Roughrider Electric Coop	800 Highway Drive		Hazen	ND	58545-4701	701-748-6500	ACCT#11560000 due 6-19	
Shreveport	ELECTRIC SERVICES	Southwestern Electric Power Co	P.O. Box 24041		Canton	TX	44701-188-216-3523		961-790-570-1-1	
MT Pleasant	ELECTRIC SERVICES	Southwestern Electric Power Co	P.O. Box 24041		Canton	TX	44701-188-216-3523		963-770-570-1-5	
CLARKSBURG	ELECTRIC SERVICES	SUN VALLEY PSD	P.O. Box 24422		Canton	TX	44701-188-216-3523		968-796-087-1-7	
Glynn	ELECTRIC SERVICES	TCEC	70525 Old Site 50		Clarkburg	WV	26501		304-623-3905	2890014H
HOUSTON	ELECTRIC SERVICES	TXU ENERGY	P.O. Box 880		Hooker	OK	73945-1-800-522-3315	580-652-3151	44443001	
MIDLAND	ELECTRIC SERVICES	TXU ENERGY	P.O. Box 650538		DALLAS	TX	75265-0638	888-399-5501	972-556-6111	1000-26540969
STL	ELECTRIC SERVICES	VECTREN ENERGY	P.O. Box 650538	1 VECTREN SQUARE	DALLAS	TX	75265-0638	972-556-6111	620510673-57803955	
El Dorado	ELECTRIC SERVICES	Westar Energy	P.O. Box 758500		EVANSVILLE	IN	47708	812-491-4738		
Wichita	ELECTRIC SERVICES	Westar Energy	P.O. Box 758500		Topeka	KS	66575-1-800-401-5666	212-616-7612	243455083	
GREENLEY	ELECTRIC SERVICES	XCEL ENERGY	P.O. Box 9477		MINNEAPOLIS	MN	55484-9477		53-378-2295-4	
GREELEY	ELECTRIC SERVICES	XCEL ENERGY	P.O. Box 9477		MINNEAPOLIS	MN	55484-9477	800-481-4700		
GLENCO	GAS SERVICES	ALLGAS INC	201 CORPORATE DR		RAINBOW CITY	AL	35206 256-442-8323	256-586-7539		
Greeley	GAS SERVICES	City Of Greeley	Director of Finance		Greeley	CO	80532-1928			
Wichita	GAS SERVICES	Kansas Gas Service	P.O. Box 219046		Kansas City	MO	64121-1-800-794-4780	785-575-8547	510031742 1337724-36	
El Dorado	GAS SERVICES	Kansas Gas Service	P.O. Box 219046		Kansas City	MO	64121-1-800-794-4780	785-575-8547	510763514 1622740-09	
Tulsa	GAS SERVICES	Kansas Gas Service	P.O. Box 219296		Kansas City	MO	64121-1-800-794-4780	785-575-8547	213005723 1058873-27	
Salt Lake	GAS SERVICES	Questar Gas Company	P.O. Box 45841		Salt Lake City	UT	84139-0001			
Kansas City	GAS SERVICES	MISSOURI GAS ENERGY	P.O. Box 219255		KANSAS CITY	MO	64194-3420	800-582-1234	382912222	
Kansas City	GAS SERVICES	MISSOURI GAS ENERGY	P.O. Box 219255		KANSAS CITY	MO	64194-3420	800-582-1234	528973111	
Kansas City	GAS SERVICES	MISSOURI GAS ENERGY	P.O. Box 219255		KANSAS CITY	MO	64194-3420	800-582-1234	615594111	
Kansas City	GAS SERVICES	MISSOURI GAS ENERGY	P.O. Box 219255		KANSAS CITY	MO	64194-3420	800-582-1234	71387111	

Location	Service Type	Utility Provider Name	Address1	Address2	City	State	Zip	Phone No.	Fax No.	Account No.
HOUSTON	INTERNET SERVICES	BIRCH COMMUNICATIONS	P.O. Box 103666		ATLANTA	GA	30348-5066	888-712-4724	578-388-1981	723394
MIDLAND	INTERNET SERVICES	SUDENLINK	P.O. Box 660365		DALLAS	TX	75265-0365	800-490-9604		3014-773248201
Kansas City	INTERNET SERVICES	TIME WARNER CABLE	P.O. Box 1104		CAROL STREAM	IL	60132-1104	816-743-2477		108794701
Shreveport/Dickerson/Saithake	INTERNET SERVICES	Century Link	P.O. Box 52187		Phoenix	AZ	85072	800-860-1070	318-388-9562	82498839
ARTESIA	INTERNET SERVICES	Century Link			Phoenix	AZ	85038-9040	800-600-1117	318-388-9562	575-748-8821 529
Cheyenne	INTERNET SERVICES	Century Link			Phoenix	A2	85038-9040		318-388-9562	Acct 307-638-1300-0938
GREELEY	INTERNET SERVICES	Century Link			Phoenix	A2	85038-9040		318-388-9562	82498839
OSKALOOSA	INTERNET SERVICES	CENTURY LINK							27	
Wichita	INTERNET SERVICES	Cox Communications	P.O. Box 29040		Phoenix	AZ	85038-9040	800-600-1117	318-388-9562	0011001056416101
Eldorado	INTERNET SERVICES	Cox Communications	P.O. Box 29040		Phoenix	AZ	85038-9040	73124 800-620-6196		0011002056431601
McPherson	INTERNET SERVICES	Cox Communications	P.O. Box 24871		Oklahoma City	OK	73124 800-620-6196		0011008064686001	
Tulsa	INTERNET SERVICES	Cox Communications	P.O. Box 24876		Oklahoma	OK	73124 918-806-6079		0016311069488901	
MIPLAND	INTERNET SERVICES	NET WEST ONLINE	P.O. Box 24876		ODESSA	TX	79762		901362195	
Cheyenne	INTERNET SERVICES	Rise Broadband	P.O. Box 2837		Omaha	NE	68103-2837		07-01-15 thru 07-31-15 due 07-	
Guymon	LONG DISTANCE SERVICE	AT&T	P.O. Box 105068		Atlanta	GA	30348-325-0445		01	
Coffeyville	LONG DISTANCE SERVICE	AT&T	P.O. Box 5001		CAROL STREAM	IL	60197-5001	877-438-0041	302-655-5049	030-589-2448-001
Guymon	LONG DISTANCE SERVICE	AT&T	P.O. Box 2211		Tulsa	OK	74121 888-795-2717		302-655-5049	620-251-8880 404 3
Midland Tx/tulsa	LONG DISTANCE SERVICE	Century Link	P.O. Box 52187		Phoenix	AZ	85072	800-860-1020	318-388-9562	83988350
Glencoe	LONG DISTANCE SERVICE	Century Link	P.O. Box 4300		Phoenix	A2	85072	800-860-1020	318-388-9562	83988380
Shreveport	LONG DISTANCE SERVICE	Century Link	P.O. Box 105068		Carol Stream	IL	60197 877-285-2491		41703673	
BILLINGS	LONG DISTANCE SERVICE	AT&T	P.O. Box 5093		ATLANTA	GA	30348-5068	877-325-0445	302-655-5049	030 589 7768 001
STL	PHONE SERVICES	AT&T	P.O. Box 10414		CAROL STREAM	IL	60197-5019	800-924-1743	302-655-5049	314 85-587-902 909 6
Kansas City	PHONE SERVICES	AT&T	P.O. Box 102 Main St		ATLANTA	GA	30348-5414	800-559-7928	302-655-5049	432-653-2138 165 6
Flowood	PHONE SERVICES	AT&T	P.O. Box 5001		McComb	MS	39648	866-620-6000	302-655-5049	601 932-731 001 0592
McPherson	PHONE SERVICES	AT&T	P.O. Box 105262		CAROL STREAM	IL	60197-5001	877-438-0041	302-655-5049	620-245-0168 920-7
GLENCOE	PHONE SERVICES	AT&T	P.O. Box 5001		ATLANTA	GA	30348-5262	877-438-0041	302-655-5049	770 425-0433 651 184
Kansas City	PHONE SERVICES	AT&T	P.O. Box 5001		CAROL STREAM	IL	60197-5001	877-438-0041	302-655-5049	816-842-3690
KC/MKT RELEASENT	PHONE SERVICES	AT&T	P.O. Box 5019		CAROL STREAM	IL	60197-5019	800-235-7624	302-655-5049	831-000-2130 238
McPleasant	PHONE SERVICES	AT&T	P.O. Box 5001		CAROL STREAM	IL	60197-5001	877-438-0041	302-655-5049	903-572-3420 183
McPleasant	PHONE SERVICES	AT&T	P.O. Box 5001		CAROL STREAM	IL	60197-5001	877-438-0041	302-655-5049	903-572-3649 413
Tulsa	PHONE SERVICES	AT&T	P.O. Box 5001		CAROL STREAM	IL	60197-5001	877-438-0041	302-655-5049	918-495-2300 925-5
GREELEY	PHONE SERVICES	AT&T	P.O. Box 105068		Atlanta	GA	30348-5068		302-655-5049	Account#151 210-9735 151 DUE 7-4
COMPANY WIDE	PHONE SERVICES	AT&T UNIVERSAL BILLER	P.O. Box 78045		PHOENIX	AZ	85062-8045	800-358-111	302-655-5049	171-785-3524 107
Dickinson	PHONE SERVICES	Century Link	P.O. Box 29040		Phoenix	AZ	85038-9040		318-388-9562	Acct 701-225-9414 965 DUE 6-28
SURE/REPORT	PHONE SERVICES	CENTURYLINK	P.O. Box 4300		CAROL STREAM	IL	60197-4300	800-201-4102	318-388-9562	413631622
Omaha	PHONE SERVICES	CENTURYLINK	P.O. Box 91154		SEATTLE	WA	98111-9254	800-777-9594	318-388-9562	402-345-7051
Salt Lake	PHONE SERVICES	CENTURYLINK	P.O. Box 29040		PHOENIX	AZ	85038-9040	888-544-4495	318-388-9562	970-353-1760 8798
DES MOINES	PHONE SERVICES	CENTURYLINK	P.O. Box 20550		ROCHESTER	NY	14602-0550	888-278-8783	203-614-5054	
HOUSTRON	PHONE SERVICES	FRONTIER	P.O. Box 20550		ROCHESTER	NY	14602-0550	800-921-8102	203-614-5054	
CLARKSBURG	PHONE SERVICES	FRONTIER	P.O. Box 20550		OSKALOOSA	IA	52577	641-676-1099		
OSKALOOSA	PHONE SERVICES	FRONTIER	P.O. Box 20550		Guymon	OK	73942 800-562-2556	75266-0108	152529	
Guymon	PHONE SERVICES	PTCI	P.O. Box 1188		Dallas	TX	75266-0108		212-571-1897	1398563737 due 6-21
Billing	PHONE SERVICES	Verizon Wireless	P.O. Box 660108		Dallas	TX	75266-0108		1397895322 due 6-18	870094658-00001 INV
GREENLEY	PHONE SERVICES	Verizon Wireless (ES)	P.O. Box 660108						Acct 372768242-00001 INV	
GREENLEY	PHONE SERVICES	Verizon Wireless (GR)	P.O. Box 660108						1397895322 due 6-16	
Wichita	PHONE SERVICES	Windstream	Louisville	KY					102421	
Eldorado	PHONE SERVICES	Windstream	Louisville	KY					115456	
CLARKSBURG	PHONE SERVICES	WINDSTREAM	Louisville	KY					21709334	
Kansas City	TELECONFERENCE SERVICES	AT&T TELECONFERENCE SERVICES	P.O. Box 5002		CAROL STREAM	IL	60197-5002	800-772-3481	302-655-5049	97995067-0001

